

time for the filing of a brief in the above-captioned matter, respectfully representing as follows:

1. The Defendant has filed a motion in limine seeking to have certain evidence ruled inadmissible at trial.

2. On September 23, 2002 defendants mailed the Plaintiffs' counsel a copy of its Brief in support of that Motion.

3. Pursuant to the Local Rules, the Plaintiffs brief in opposition to the Defendant's Motion is due fifteen days after service; pursuant to F.R.C.P. 6(e), this time period is extended by three days after service by mail. Accordingly, by operation of these rules the Plaintiffs' Brief would be due on October 10, 2002.

4. Because of the nature and complexity of the issues involved in the Defendant's Motion, Plaintiffs' counsel is requesting an extension of time for the filing of the Brief in Opposition to the Defendant's Motion.

5. Additionally, Plaintiff's counsel has recently joined a new firm and moved his office.

6. Undersigned counsel has contacted opposing counsel who indicated that he had no objection to an extension of time.

7. The extension which the Defendant is requesting is two weeks, in other words, until October 24, 2002.

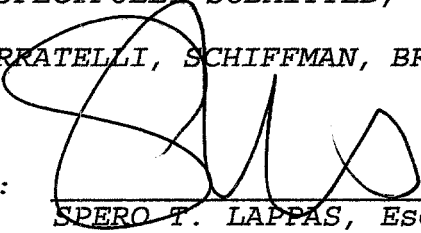
8. No prejudice will attach to the defense if this motion be granted.

WHEREFORE, the Plaintiffs request that his motion for an extension of time be granted.

RESPECTFULLY SUBMITTED,

SERRATELLI, SCHIFFMAN, BROWN AND CALHOON, P.C.

By:



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ATTORNEYS FOR THE PLAINTIFF

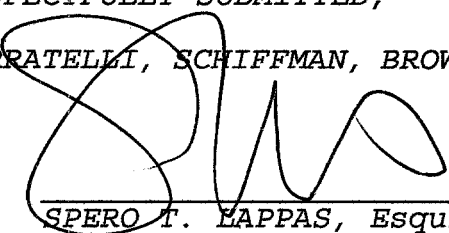
CERTIFICATE OF CONCURRENCE

I hereby certify that, I contacted Gregory Neuhauser, Esquire counsel for defendants and sought concurrence in the attached motion. Concurrence was granted.

RESPECTFULLY SUBMITTED,

SERRATELLI, SCHIFFMAN, BROWN AND CALHOON, P.C.

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CERTIFICATE OF SERVICE

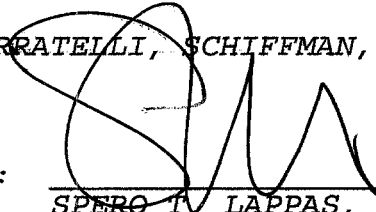
I hereby certify that I am this day serving a true and correct copy of the attached document upon the person(s) named below by mailing a copy addressed as follows, postage pre-paid, deposited into the U.S. Mail at Harrisburg, PA.

GREGORY NEUHAUSER, ESQUIRE
OFFICE OF ATTORNEY GENERAL
STRAWBERRY SQUARE
HARRISBURG, PA 17120

RESPECTFULLY SUBMITTED,

SERRATELLI, SCHIFFMAN, BROWN AND CALHOON, P.C.

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